

# **EXHIBIT A**

DIANNE D. CALHOUN : IN THE  
15440 General Lafayette Blvd. : CIRCUIT COURT  
Brandywine, MD 20613 :  
  
Plaintiff : FOR  
  
v. : CHARLES COUNTY  
  
BATH & BODY WORKS, LLC :  
3025 Marketplace :  
Waldorf, MD 20603 :  
SERVE ON: Resident Agent :  
The Corporation Trust, :  
Incorporated :  
2405 York Road, Ste 201 :  
Lutherville, MD 21093-2264 :  
  
Defendant :  
:  
\* \* \* \* \*

COMPLAINT  
PRAYER FOR JURY TRIAL  
CIVIL INFORMATION SHEET

Dianne D. Calhoun, Plaintiff, by Todd L. Schuler, and  
Blondell, Miller & Schuler, her attorneys, sue the Defendant,  
Bath & Body Works, LLC, to wit:

PREAMBLE

1. Dianne D. Calhoun, Plaintiff, is a resident of Prince George's County Maryland.
2. Bath & Body Works, LLC, is a corporation doing business in the State of Maryland.
3. This action arises from inadequate and negligent maintenance at the Bath & Body Works, LLC, on December 28, 2020, at 3025 Marketplace, in Charles County, Maryland.

STATEMENT OF FACTS

4. On December 28, 2020, the Plaintiff, Dianne D. Calhoun, went to the Defendant's place of business to do some shopping with.

5. As the Plaintiff was shopping in the store, she walked up to the cash register to pay for her merchandise.

6. The Plaintiff was standing in front of the counter when she turned to exit the store.

7. As the Plaintiff was walking toward the exit the Plaintiff tripped and fell over cords that had been taped to the floor, falling to the ground and causing serious bodily injuries.

COUNT ONE

Now comes the Plaintiff, Dianne D. Calhoun, and sues the Defendant, Bath & Body Works, LLC, and reallege and incorporate by reference all those facts and allegations in Paragraphs One through Seven above and further allege:

8. The Defendant owed a duty to the Plaintiff to use reasonable and ordinary care to keep the floor of the Bath & Body Works, where invitees were expected to walk, free from unsafe conditions, and to give reasonable notice of an unsafe condition.

9. The Plaintiff's injuries were caused by the recklessness, carelessness and negligence of the Defendant in that their agents, servants and employees:

a. created a hazardous and dangerous condition in the Bath & Body Works store by allowing employees to

tape cords to the floor where invitees were expected to walk;

b. failed to warn invitees generally, and the Plaintiff specifically, of the danger posed by the presence of the taped cords in an area where invitees were expected to walk;

c. failed to keep a proper lookout for invitees shopping in the store;

d. And, in other respects operated and managed the Bath & Body Works store in a dangerous and negligent manner.

10. As a direct and proximate result of the negligence and carelessness of the Defendant, the Plaintiff:

a. suffered serious, painful and permanent bodily injuries, great physical pain and mental anguish, severe and substantial emotional distress and loss of the capacity for the enjoyment of life;

b. was, is, and will be required to undergo medical treatment and to incur medical costs and expenses in order to alleviate his injuries, pain and suffering;

c. was, is, and will be precluded from engaging in normal activities and pursuits, including a loss of ability to earn money and of actual earnings;

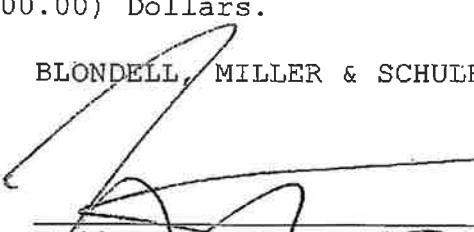
d. and, otherwise was hurt, injured and caused to sustain losses.

11. All of the Plaintiff's losses and damages were, are and will be due solely to and by reason of the carelessness and negligence of the Defendant.

12. None of the Plaintiff's losses or damages were the result of any negligence or want of due care on her part contributing thereto.

WHEREFORE, this Plaintiff claims damages in excess of Seventy-five Thousand (\$75,000.00) Dollars.

BLONDELL, MILLER & SCHULER, and

  
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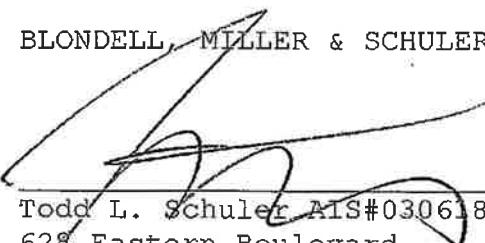
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\* \* \* \* \*

PRAYER FOR JURY TRIAL

Sir/Madam Clerk:

The Plaintiff elects and prays to have this case tried before a jury.

BLONDELL, MILLER & SCHULER, and

  
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